

# EXHIBIT C



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**Reply To:**

October 15, 2021

Hon. David Brittingham  
255 E. Fifth Street  
Suite 1900  
Cincinnati, OH 45202  
[David.brittingham@dinsmore.com](mailto:David.brittingham@dinsmore.com)

**RE: Harsman, et al v. Cincinnati Children's, et al**  
**Case No. 1:21-cv-597-TSB**

Dear Mr. Brittingham:

We plan to continue litigating our claims and will appeal all rulings from Judge Black.

We are more than comfortable refuting your assertions and stand by our attempts on behalf of these healthcare workers.

Judge Black is not omnipotent, and our position is far from "conspiracy theories."

I want to address a few of your specific allegations:

1. Receiving over 20,000 emails from 5,000 healthcare workers is far from not doing a factual review.
2. Having several competent lawyers and clerks performing research and drafting our claims is far from not investigating.
3. Removing a case to federal court is forum shopping.
4. Winning or losing is not the standard. We are allowed to advance claims based upon facts, law and good faith modification of existing law. The issue of the hospitals being a quasi-state actor is one such issue. Whether *Jacobson* is still good law is another.
5. Other jurisdictions on the same facts and law have decided these issues differently.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn Feagan". The signature is written in a cursive, flowing style with a large, stylized "G" and "F".

Glenn Feagan